

Joseph A. Kaufman, No. 228319  
**JOSEPH KAUFMAN & ASSOCIATES, INC.**  
54 E. Holly Street  
Pasadena, CA 91103  
Telephone: 626-250-0405  
Facsimile: 626-768-7066  
joe@lemonlawaid.com

THE LAW OFFICE OF JEFFREY L LE PERE  
Jeffrey L. Le Pere, SBN 201787  
105 N. Rose Street, Ste 210  
Escondido, CA 92027  
Telephone: (858) 544-2292  
eservice@rvautolegalteam.com

Attorneys for Plaintiff KRISTY KOHNDROW

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

KRISTY KOHNDROW, an individual,

Plaintiff,

v.

FORD MOTOR COMPANY, a Delaware  
corporation, and DOES 1 through 10,  
inclusive,

Defendants.

Case No. 5:23-cv-04354-PCP

**[PROPOSED] JUDGMENT ON  
PLAINTIFF'S NOTICE OF  
ACCEPTANCE OF DEFENDANT'S  
RULE 68 OFFER OF JUDGMENT**

Honorable P. Casey Pitts  
Magistrate Nathanael M Cousins

Removal Date: August 24, 2023

1 Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Plaintiff Kristy  
2 Kohndrow shall recover from Defendant Ford Motor Company the amount of \$56,565.73,  
3 any remaining balance for the 2020 Ford Mustang, VIN 1FA6PP8CF2L5187971. Plaintiff  
4 will surrender the 2020 Ford Mustang to Ford Motor Company or its designee within sixty  
5 (60) days.

6 Plaintiff retains the right to petition the Court for an award of reasonable attorney  
7 fees and costs recoverable pursuant to California Civil Code section 1794(d). In ruling in  
8 Plaintiff's fee/cost motion(s), the attorney fees, expenses and costs shall be calculated as if  
9 Plaintiff was found to have prevailed in this action under California Civil Code section  
10 1794(d).

11 IT IS SO ORDERED

12 Dated: April 2, 2024



HON. P. CASEY PITTS  
UNITED STATES DISTRICT JUDGE  
NORTHERN DISTRICT OF CALIFORNIA